

1 ROGER L. GRANDGENETT II, ESQ., Bar # 6323
2 KELSEY E. STEGALL, ESQ., Bar # 14279
3 LITTLER MENDELSON, P.C.
3960 Howard Hughes Parkway
Suite 300
Las Vegas, NV 89169-5937
4 Telephone: 702.862.8800
Fax No.: 702.862.8811
5 Email: rgrandgenett@littler.com
kstegall@littler.com

6 Attorneys for Defendant
7 ANTHONY & SYLVAN POOLS, CORP.

8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11
12 DAVE G. CROSS, an individual,
13 Plaintiff,

14 vs.

15 ANTHONY & SYLVAN POOLS, CORP.,
a foreign corporation; DOES I through X,
16 inclusive; and ROE CORPORATIONS I
through V, inclusive,

17 Defendants.
18

Case No. 2:20-cv-00454-JCM-EJY

**STIPULATION AND ORDER TO
CONTINUE EARLY NEUTRAL
EVALUATION SESSION**

[FIRST REQUEST]

19 Defendant ANTHONY & SYLVAN POOLS, CORP. (hereinafter “Anthony & Sylvan” or
20 “Defendant”), and Plaintiff DAVE G. CROSS (“Plaintiff”), by and through their attorneys of record,
21 hereby stipulate and agree to continue the date for the Early Neutral Evaluation (“ENE”) Session
22 presently schedule for July 13, 2020 at 10:00 a.m., before U.S. Magistrate Judge Daniel J. Albregts
23 (ECF No. 14), due to the unavailability of Plaintiff’s counsel.

24 The parties are available and propose **July 27, 2020**, or any other dates available on this Court’s
25 calendar thereafter.

26 The parties further request that the confidential written evaluation statement be due to
27 Magistrate Judge Albregts’s chambers one week prior to the new date of the ENE Session **by 12:00**
28 **p.m. Noon.** via email delivery to Kimberly_LaPointe@nvd.uscourts.gov.

1 The parties further request that any motions for exemption from the Court's attendance
2 requirements at the ENE be reset to 14 days prior to the new date of the ENE Session.

3 This extension is sought in good faith, and not for the purpose of delay.

4 Dated: June 29, 2020

Dated: June 29, 2020

5 Respectfully submitted,

Respectfully submitted,

6
7 /s/ Margaret A. Manning, Esq.
8 MICHAEL C. VAN, ESQ.
9 MARGARET A. MANNING, ESQ.
SHUMWAY VAN

/s/ Kelsey E. Stegall, Esq.
ROGER L. GRANDGENETT, ESQ.
KELSEY E. STEGALL, ESQ.
LITTLER MENDELSON, P.C.

10 Attorney for Plaintiff
DAVE G. CROSS

Attorneys for Defendant
ANTHONY & SYLVAN POOLS, CORP.

11 **This matter is set for 7/27/20 at 10:00 a.m**
12 **IT IS SO ORDERED.**

13
14 

15 THE HONORABLE DANIEL J. ALBREGTS
16 UNITED STATES MAGISTRATE JUDGE

17 DATED: June 30, 2020
18

19 4838-7838-7393.1 078710.1008
20
21
22
23
24
25
26
27
28